

NO. 03-20-00129-CV

**In the Third Court of Appeals,
Austin Texas**

FILED IN
3rd COURT OF APPEALS
AUSTIN, TEXAS
7/28/2020 2:29:31 PM
JEFFREY D. KYLE
Clerk

QATAR FOUNDATION FOR EDUCATION, SCIENCE AND COMMUNITY DEVELOPMENT,
Appellant,

V.

KEN PAXTON, ATTORNEY GENERAL, AND ZACHOR LEGAL INSTITUTE,
Appellees.

On appeal from the 200th Judicial District Court, Travis County,
Texas, Trial Court No. D-1-GN-18-006240
The Honorable Karin Crump, Judge Presiding

**SECOND JOINT UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE
RESPONSE BRIEFS**

To the Honorable Justices of the Third Court of Appeals:

Come now Appellee Zachor Legal Institute, joined by Appellee Ken Paxton, Attorney General of Texas, and pursuant to Texas Rules of Appellate Procedure Rules 38.6(d) and 10.5(b), file this Second Joint Unopposed Motion to Extend by 30 days their respective deadlines to file response briefs and would show as follows:

1. The current deadline is July 31, 2020.

2. Appellee Zachor Legal Institute and Appellee Ken Paxton, Attorney General seek an additional 30 (thirty) days to file their briefs, which will fall on Monday, August 31, 2020.
3. This is Appellee Zachor Legal Institute and Appellee Ken Paxton, Attorney General's second request of an extension of the deadline to file their response briefs.
4. Appellee Zachor Legal Institute has new lead appellate counsel, Dale Wainwright, who had unexpected matters occur in a short period of time in two of his other cases that require immediate attention. The current deadline will not give him the time he needs to become familiar with the case and to devote the attention needed to Zachor's response brief.
5. Appellee Zachor Legal Institute does not seek this extension for the purpose of delay, but so that it may have additional appellate assistance on this case.
6. Appellee Ken Paxton does not wish to have staggered deadlines, which would also affect the reply deadlines.
7. Counsel for Appellant has indicated that Appellant does not oppose this motion.

PRAYER

FOR THESE REASONS, Appellee Zachor Legal Institute and Appellee Ken Paxton, Attorney General, respectfully request that the Court grant this motion and extend its deadline to file their response briefs thirty days, from July 31, 2020 to and including Monday, August 31, 2020.

Respectfully submitted,

/s/Jennifer S. Riggs-----

Jennifer S. Riggs

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CERTIFICATE OF CONFERENCE

I hereby certify that I exchanged emails with counsel of record for the Appellant and for the Attorney General by email. Counsel for Appellant responded that their client does not oppose this motion. Counsel for the Attorney General indicated that she did not oppose the motion provided we made it for both appellees in order to avoid staggering the response brief deadlines.

/s/ Jennifer S. Riggs
Jennifer S. Riggs

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served by e-service on this 28th day of July, 2020, to:

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/s/Jennifer S. Riggs-----
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